

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

APR 05 2022  
SEAN F. McAVOY, CLERK  
SPOKANE, WASHINGTON  
DEPUTY

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA.

Plaintiff,

V.

JONATHAN RIVERA-VENEGAS,

Defendant.

1:22-CR-2034-SAB

## INDICTMENT

Vios: 21 U.S.C. §§ 841(a)(1),  
(b)(1)(C), 846  
Conspiracy to Distribute  
Fentanyl  
(Count 1)

21 U.S.C. § 841(a)(1),  
(b)(1)(C)  
Distribution of Fentanyl  
(Counts 2 and 3)

21 U.S.C. § 853  
Forfeiture Allegations

The Grand Jury charges:

COUNT 1

Beginning on a date unknown, but by on or about June 5, 2021, and continuing until on or about August 17, 2021, in the Eastern District of Washington and elsewhere, the Defendant, JONATHAN RIVERA-VENEGAS,

1 did knowingly and intentionally combine, conspire, confederate and agree with  
2 other persons, both known and unknown, to commit the following offense:  
3 distribution of a mixture or substance containing a detectable amount of N-phenyl-  
4 N-[1-(2-phenylethyl)-4-piperidinyl]propanamide (a/k/a “Fentanyl”), a Schedule II  
5 controlled substance, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(C), 846.

6 COUNT 2

7 On or about August 7, 2021, in the Eastern District of Washington, the  
8 Defendant, JONATHAN RIVERA-VENEGAS, knowingly and intentionally  
9 distributed a mixture or substance containing a detectable amount of N-phenyl-N-  
10 [1-(2-phenylethyl)-4-piperidinyl]propanamide (a/k/a “Fentanyl”), a Schedule II  
11 controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

12 COUNT 3

13 On or about August 15, 2021, in the Eastern District of Washington, the  
14 Defendant, JONATHAN RIVERA-VENEGAS, knowingly and intentionally  
15 distributed a mixture or substance containing a detectable amount of N-phenyl-N-  
16 [1-(2-phenylethyl)-4-piperidinyl]propanamide (a/k/a “Fentanyl”), a Schedule II  
17 controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

18 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

19 The allegations contained in this Indictment are hereby realleged and  
20 incorporated by reference for the purpose of alleging forfeitures.

21 Pursuant to 21 U.S.C. § 853, upon conviction for an offense in violation of  
22 21 U.S.C. § 841 as set forth in this Indictment, the Defendant, JONATHAN  
23 RIVERA-VENEGAS, shall forfeit to the United States of America any property  
24 constituting, or derived from, any proceeds obtained, directly or indirectly, as a  
25 result of such offense and any property used or intended to be used, in any manner  
26 or part, to commit or to facilitate the commission of the offense.

1 If any of the property described above, as a result of any act or omission of  
2 the Defendant:

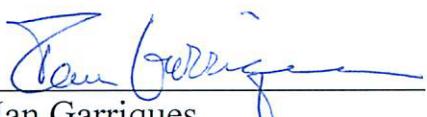
3 a. cannot be located upon the exercise of due diligence;  
4 b. has been transferred or sold to, or deposited with, a third party;  
5 c. has been placed beyond the jurisdiction of the court;  
6 d. has been substantially diminished in value; or  
7 e. has been commingled with other property which cannot be divided  
8 without difficulty;

9 the United States of America shall be entitled to forfeiture of substitute property  
10 pursuant to 21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c).  
11

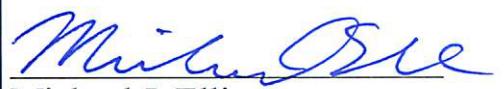
12 DATED this 5 day of April, 2022.

13 A TRUE BILL  
14  
15  
16

17 Vanessa R. Waldref  
18 United States Attorney

19   
20 Ian Garriques

21 First Assistant United States Attorney  
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23   
24 Michael J. Ellis  
25 Assistant United States Attorney

26   
27 Stephanie A. Van Marter  
28 Assistant United States Attorney